

Exhibit 1

Defendants' Proposed Additional Voir Dire: General Questions

1. You all filled out a questionnaire at the beginning of August and understandably things may have changed in the last month and a half. Do you have any updates to the questionnaire that would affect your ability to serve as a juror in this case?
 - a. Travel plans over the next month, a change in your finances or family obligations, or something that now makes you believe you cannot be fair & impartial?
 - b. Or maybe you have seen more recent news articles about former President Trump or others than have affected your ability to be a fair and impartial juror.
 - c. Or maybe you have had time to think about the answers you provided and have different views today.
2. Since filing out the questionnaire, have you read or learned anything about this case, this trial, Mr. Barrack or Mr. Grimes, or any of the attorneys in the case?
3. If you marked that you would like to discuss questions in private or if there are issues now you would like to discuss privately, could you please raise your hand. [Call up juror and discuss questions/issues they would like to discuss in private]
4. As we did on the written questionnaire, I want to make sure that no one here has trouble reading or understanding spoken English? Please raise your hand if you have difficulties reading or understanding spoken English.
5. Regardless of the law and instructions I will give that state that a defendant need not put on a case or seek to admit any evidence, does anyone believe that a defendant in a criminal trial should be required to produce evidence to prove that he or she is not guilty?
6. Some of the witnesses in this trial will be FBI agents who worked on the case. Does anyone here believe that testimony of an FBI agent is more credible than the testimony of another witness?
7. Over the last weeks, there have been additional news articles and coverage concerning events in former President Trump's administration and investigations into him or those events. Who has read or hears these articles (please raise your hand)?
 - a. To the extent you have seen or read these stories, did they have any potential for affecting you fairly and impartially hearing the evidence in this case?
8. Would you find it difficult to treat the testimony of someone associated with the former President the same as you would any other witness?

9. Do you feel like Mr. Barrack or Mr. Grimes might start off even a little bit behind before this case begins because they have been charged with crimes or because of what you have read, heard, or seen about the case?
10. Are there any additional issues I may not have mentioned that cause you to be concerned that you can be a fair and impartial juror in this case? This is the right time to let us know.